REMARKS

Claims 1-9 and 25-33 are pending.

Claims 1, 2, 9, 25, 26 and 33 remain rejected under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent 6,671,687 (hereinafter "Pederson") in view of U.S. Patent No. 6,785,690 (hereinafter "Davidson"). Claims 3-8 and 27-32 remain rejected under 35 U.S.C. § 103(a) as being unpatentable over Pederson and Davidson and further in view of U.S. Patent No. 6,070,174 (hereinafter "Starek"). This Office Action has been made "**final**."

The undersigned wishes to thank Examiner Ehichioya and Examiner Alam for taking the time to conduct a telephonic interview in this case on Wednesday, August 3, 2005. During the interview, the undersigned explained the novel feature of storing the data in at least one field of an instance of a user-defined type as a file outside of a database store while storing the data in the other fields of the same instance of the user-defined type within the database store. The Examiners indicated that they did not believe this feature of the invention was clearly recited in independent claims 1 and 25. While the applicants do not concede that the original language is unclear, in order to advance prosecution, the applicants have amended independent claims 1 and 25 to more expressly recite that an instance (*i.e.*, object) of a user defined type comprises "*a plurality of* fields" and that the novel storing steps of the invention involve "storing the data in . . . at least one designated field *of said plurality of fields* of the instance of the user defined type as a file outside of the database store" and "storing the data in each of the other fields *of said plurality of fields* of the instance of the user defined type within the database store." *See*, claim 1, as amended (emphasis added).[1]

As further discussed during the interview, the portions of Pederson and Davidson cited in the current Office Action do not teach or suggest the novel feature of "storing the data in . . . *at least one designated field* of [a] *plurality of fields* of [an] instance of [a] user defined type as a file outside of [a] database store" and "storing the data in *each of the other fields* of *said plurality of fields* of the instance of the user defined type within the database

---

[1] The applicants have also amended claims 1 and 25 to correct a minor informality. Specifically, the applicants have amended the claims to change the phrase "instance of the *object*" to "instance of the *user-defined type*" in both storing steps. As already recited in the "receiving" step of each claim, the "object ... *is* an instance of the user defined type," and therefore, it is more appropriate to refer to the "instance of the user-defined type" in the storing steps than to refer to the "instance of the object."

store," as recited in claims 1 and 25 (emphasis added). For example, at column, 5, lines 13-

20, Pederson states:

> In one embodiment, creating and assigning the user-defined
> data type is performed by the first database controller 210 up
> on the data in the first database 120. One example of a user-
> defined data type is a credit card type associated with a
> predetermined field of characters. As an illustrative example,
> the following function is used to assign a credit card data type
> associated with a data field.
>
> CREATE TYPE Credit_Card Type AS

At column 3, lines 48-53, Pederson states:

> Turning now to FIG. 2, another embodiment of the system
> includes a second database controller 220, a second database
> 180, and a second server 230. The client 195 can be used to
> send a request to the server 185 to extract a set of data that is
> organized, compared, or queried, from the first database 120,
> with the extracted data sent to the second database 180.

At most, these cited portions of Pederson may suggest that an instance of a user-

defined type can be stored, *as a whole*, in either a first database or a second database. But the

cited portions of Pederson do not teach or suggest the novel feature of "storing the data in . . .

at least one designated field of [a] *plurality of fields* of [an] instance of [a] user defined type

as a file outside of [a] database store" and "storing the data in each of the *other fields* of said

plurality of fields of the instance of the user defined type within the database store," as recited

in claims 1 and 25 (emphasis added). For this reason, the applicants respectfully submit that

claims 1 and 25 are patentable over Pederson, alone or in combination with the other cited art

of record. Inasmuch as the remaining claims depend either directly, or indirectly, from one of

these independent claims, the applicants submit that they too are patentable over the art of

record for the same reason. Reconsideration of the Section 103(a) rejection of the pending

claims is respectfully requested.

OTHER

The applicants filed an Information Disclosure Statement on January 27, 2005 but

have not yet received a copy of the initialed 1449 form. The applicants respectfully request

that the Examiner return a copy of the initialed 1449 form with the next action in this case.

CONCLUSION

For all the foregoing reasons, the applicants respectfully submit that the present application is in condition for allowance. Reconsideration of the Office Action and an early notice of allowance are respectfully requested.

Date: August 5, 2005

Steven B. Samuels
Registration No. 37,711

Woodcock Washburn LLP
One Liberty Place - 46th Floor
Philadelphia PA 19103
Telephone: (215) 568-3100
Facsimile: (215) 568-3439